IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v. Case No. 23-MJ-1791-jhr

VICTOR HUGO ALONZO-RAYMUNDO,

Defendant.

NOTICE OF INTENT TO ENTER GUILTY PLEA

COMES NOW, Defendant, VICTOR HUGO ALONZO-RAYMUNDO, by and through his attorney of record, Imtiaz Hossain, hereby gives notice that he intends to enter a guilty plea. All time from March 12, 2024, to the date of the plea hearing should be excluded from the speedy indictment time computation pursuant to 8 U.S.C. § 8:1326(a)(1) & (2):

Respectfully submitted,

FEDERAL PUBLIC DEFENDER 506 D. Main St., Ste. 400 Las Cruces, NM 88001 (575) 257-6930

Electronically filed March 12, 2024

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing notice was served upon the U.S. Attorney's Office, attention Joni Autrey Stahl, by electronic filing on March 12, 2024.

Hectronically filed 3/12/2024.

Imtiaz Hossain

Assistant Federal Public Defender

¹ United States v. Loughrin, 710 F.3d 1111, 1120 (10th Cir. 2013) (holding that a defendant's request to change his plea clearly constitutes a pretrial motion which triggers exclusion of time under the Speedy Trial Act, thus, the days between a notice of a change of plea and the change-of-plea hearing are excludable under the STA); see also United States v. Hunter, 9 F. App'x 857, 859-60 (10th Cir. May 24, 2001) (holding that the filing of a notice that the defendant wanted to change his plea "is treated as a pretrial motion requiring a hearing for purposes of the Speedy Trial Act," and that "the entire period between notifying the court that [the defendant] wanted to change his plea and the change-of-plea hearing itself was excluded for purposes of the Speedy Trial Act.